



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

July 9, 2012

REPLY TO THE ATTENTION OF:  
C-14J

Linda L. Height  
Vice President of Finance and Administration  
Lawrence Technological University  
21000 West Ten Mile Road  
Southfield, MI 48075-1058

Troy A. Bataille, Esq.  
100 Pearl Street / 7<sup>th</sup> Floor  
Hartford, CT 06103

Re: Lawrence Technological University Disclosure Report

Dear Ms. Height and Mr. Bataille:

The Regional Administrator signed a Final Determination in connection with the violations self-disclosed by Lawrence Technological University. I am enclosing a copy of the Final Determination.

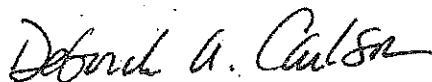
The U.S. Environmental Protection Agency had calculated a civil penalty in the amount of \$331,488. The civil penalties were as follows: \$0.00 (TSCA); \$0.00 (CWA); \$23,290 (CWA SPCC); \$27,158 (EPCRA); \$237,870 (RCRA); and \$43,170 (CAA).<sup>1</sup> EPA concluded, however, that Lawrence Technological University had met all of the criteria set forth in Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations, 65 *Fed. Reg.* 19618 (April 11, 2000), as well as the conditions set forth in the Audit Policy Agreement between the Michigan Colleges Foundation and EPA Region 5. As a result, EPA has mitigated the civil penalty by 100 percent. EPA has also concluded that Lawrence Technological University did not obtain a significant economic benefit from its tardy compliance and, therefore, will not seek to recover the economic benefit, if any, from the University.

---

<sup>1</sup> Lawrence Technological University disclosed potential TSCA and CWA violations. The lack of penalty calculated for those violations does not indicate that there weren't violations but that based on the records available, EPA was not able to calculate a precise penalty for these purposes.

I thank you and the administration of Lawrence Technological University for your cooperation and hard work. If you have any questions, please do not hesitate to call me. I may be reached at (312) 353-6121.

Sincerely,

A handwritten signature in cursive script, reading "Deborah A. Carlson".

Deborah A. Carlson  
Associate Regional Counsel

Enclosure